

IN THE UNITED STATES DISTRICT COURT FOR
THE MIDDLE DISTRICT OF ALABAMA
NORTHERN DIVISION

PROGRESSIVE SPECIALTY)
INSURANCE COMPANY,)
)
Plaintiff,)
)
v.) CIVIL ACTION NO: 2:06-CV-336-MHT
)
DARRYL D. FINCH, et al.,)
)
Defendants.)

MOTION FOR ENTRY OF DEFAULT

Comes now the plaintiff, Progressive Specialty Insurance Company (“Progressive”), pursuant to Rule 55 of the Federal Rules of Civil Procedure, and moves the clerk to enter a default against the defendant, Bernard Washington, based upon the following facts:

1. Bernard Washington was duly served with a copy of the summons and complaint on April 26, 2006 by certified mail.
2. Bernard Washington has not filed an answer or otherwise defended the complaint. He is not an infant or an incompetent.

/s/ R Larry Bradford

R. Larry Bradford, Attorney for Plaintiff,
Progressive Specialty Insurance Company
Attorney Bar Code: BRA039

OF COUNSEL:

Bradford & Sears, P.C.
2020 Canyon Road
Suite 100
Birmingham, AL 35216

CERTIFICATE OF SERVICE

I hereby certify that I have this the 11th day of July, 2006, served a copy of the foregoing to all attorneys of record by placing a copy of same in the United States Mail, postage prepaid and properly addressed as follows:

Mr. Darryl D. Finch
3347 Wells Road
Montgomery, Alabama 36108

Darryl D. Finch Enterprises, Inc
P.O. Box 240224
Montgomery, Alabama 36124

/s/ R Larry Bradford
OF COUNSEL